

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARIE TAMARA THOMAS,

Plaintiff,

Civil Action No. 11 Civ. 1490 (LLS)(ECF)

-against-

THE HARTFORD LIFE INSURANCE
COMPANY OF AMERICA, and THE GROUP
LONG TERM DISABILITY PLAN FOR
EMPLOYEES OF JPMORGAN CHASE BANK,

**NOTICE OF MOTION FOR
RECONSIDERATION**

DOCUMENT
ELECTRONICALLY FILED

Defendants.

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PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support Of Defendants' Motion for Reconsideration of the Court's Memorandum and Order entered on January 2, 2013,¹ and the pleadings and motion papers filed heretofore, the Defendants, Hartford Life and Accident Insurance Company ("Hartford") sued herein as The Hartford Life Insurance Company of America and The Group Long Term Disability Plan for Employees of JPMorgan Chase Bank, by its attorneys, Sedgwick LLP, will move this Court at a date and time to be scheduled by the Court or as soon thereafter as counsel can be heard, before the Hon. Louis L. Stanton, U.S.D.J., at the United States Courthouse, Southern District of New York located at 500 Pearl Street, New York, New York for an Order pursuant to Rule 6.3 of the Local Rules of the United States District Court for the Southern District of New York granting Reconsideration of this Court's Memorandum and Order entered on January 2, 2013 partially granting the Plaintiff's Motion for Summary Judgment to the extent that it remanded the claim back to Hartford for further consideration in line with its rulings, and denying Defendants' Motion for Summary Judgment, and upon doing so, deny Plaintiff's Motion for Summary Judgment in its entirety, grant Defendants' Motion for Summary Judgment in its entirety and vacate the Judgment entered on January 7, 2013.

¹ Judgment remanding this matter back to Hartford for further consideration was entered in accordance with the Order on January 7, 2013. (Doc. No. 47).

Dated: New York, New York
January 22, 2013

Respectfully submitted,

s/

MICHAEL H. BERNSTEIN (MB-0579)

MATTHEW P. MAZZOLA (MM-7427)

SEDGWICK LLP

Attorneys for Defendants

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New York, New York 10281-1008

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CERTIFICATE OF SERVICE

I, Matthew P. Mazzola, hereby certify and affirm that a true and correct copy of the attached **NOTICE OF MOTION FOR RECONSIDERATION** was served via Regular Mail and ECF on this 22nd day of January, 2013, upon the following:

Robert J. Bach, Esq.
60 East 42nd Street
40th Floor
New York, New York 10165

s/_____
Matthew P. Mazzola (MM-7427)

Dated: New York, New York
January 22, 2013